

EX PARTE OR LATE FILED
KRASKIN, LESSE & COSSON, LLP
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

STAMP AND RETURN

ORIGINAL

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

August 8, 2000

RECEIVED

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

CC: 96-45

AUG 8 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Valor Telecommunications of Texas, LP and GTE Southwest
Incorporated Joint Petition for Waiver of the Definition of
"Study Area" of the Appendix - Glossary of Part 36; DA 00-1015
Ex Parte Meeting

Dear Ms. Salas:

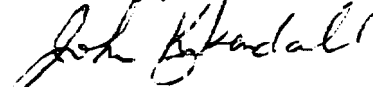
On August 7, 2000, David Cosson and John Kuykendall of Kraskin, Lesse & Cosson, LLP and Gerry Duffy of Blooston, Mordkofsky, Jackson and Dickens met with Carol Matthey, Katherine Schroder, Jack Zinman of the Common Carrier Bureau to discuss the Petition to Reject Rural Telephone Company Self-Certification filed by Western Wireless Corporation ("Western Wireless") on July 27, 2000 and the Opposition of Valor Telecommunications of Texas, LP ("VALOR") filed on August 4, 2000 in the above-referenced proceeding.

The discussion included demonstrating to Commission staff that the issue that Western Wireless seeks to raise in its petition - whether VALOR is a rural telephone company under 47 U.S.C. Section 153(37) - has no bearing on whether the requested study area waiver is appropriate and should be granted. In addition, VALOR's representatives explained that any delay in granting the study area waiver would not be in the public interest.

In the course of the meeting, VALOR's representatives provided a letter dated June 27, 2000, from VALOR to Ms. Sheryl Todd of the Universal Service Branch, Accounting and Audits Division of the FCC (see attached). VALOR also provided the attached information that describes VALOR's service area and Western Wireless' coverage area.

Please contact me if there are any questions regarding this matter.

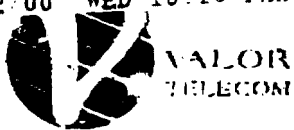
Sincerely yours,


John Kuykendall

Attachments

cc: Carol Matthey
Katherine Schroder
Jack Zinman

No. of Copies rec'd 2
List ABCDE



June 27, 2000

Ms. Sheryl Todd
 Universal Service Branch
 Accounting and Audits Division, FCC
 445 12th Street, SW
 Washington, DC 20554

Re: Valor Rural Self-Certification

Dear Ms. Todd:

I am writing this letter on behalf of Valor Telecommunications of New Mexico, LLC and Valor Telecommunications of Texas, LP. We are a start-up Telecommunications Company formed with the acquisition of over 500,000 access lines from GTE Southwest in Texas, New Mexico and Oklahoma. Valor has received regulatory approval for the purchase of these lines and has been certificated as an incumbent local exchange carrier in all three states.

In Texas, Valor Telecommunications was granted a certificate of convenience and necessity and was designated as an eligible telecommunications carrier by order dated June 14, 2000, in Docket 21834, Application of Valor Telecommunications of Texas, LP, for Approval of Sale, Transfer, or Merger, Issuance of a Certificate of Convenience and Necessity, Designation as an Eligible Telecommunications Provider, and Designation as an Eligible Telecommunications Carrier.

On June 20, 2000, the New Mexico Public Regulation Commission issued its final order in Utility Case No. 3217 approving GTE Southwest's sale of its operating facilities and equipment in New Mexico to Valor; approving GTE Southwest's request to discontinue service in New Mexico; and granting Valor's request for all necessary authority to provide basic local exchange and exchange access services and designation as an Eligible Telecommunications Carrier upon completion of the transaction.

Valor meets the criteria set forth in Section 3(37)(D) of the Communications Act of 1934, as amended (47 U.S.C §153(37)(D)), for designation as a "rural telephone carrier" in both Texas and New Mexico. Section 3(37)(D) states that a rural telephone company means a local exchange carrier that has less than 15 percent of its access lines in communities of more than 50,000 on the date of enactment of the Telecommunication Act of 1996." As the enclosed data indicates, Valor falls into this category of a rural telephone company in both Texas and New Mexico.

GTE Southwest has provided Valor the enclosed line count information. Valor is expected to close on the acquisition of the Texas and New Mexico lines on September 1, 2000. In addition, the population data is provided by the United States Census Bureau (US Census). Valor seeks to obtain rural telephone carrier status for the year 2001 and as such files this self-certification prior to its close with GTE.

The enclosed line counts for Texas and New Mexico, based on 1999 information provided to Valor by GTE Southwest, show that in Texas, the only central office that services 15% of Valor's access lines is Texarkana and according to the most recent US Census Data of Population Estimates for Consensus Designated Places (which includes communities), Texarkana has 31,485 inhabitants. The line counts also show that in New Mexico that the only central office servicing 15% of Valor's access lines is Carlsbad and according to the US Census data, Carlsbad has 26,315 inhabitants.

Valor Telecommunications Southwest, LLC
 500 E. Las Colinas Blvd. Suite 1900, Dallas, TX 75039
 Telephone - (972) 373-1000 Facsimile - (972) 373-1050



VALOR
TELECOM

From the information provided, and under Section 3(37)(D), Valor is a rural telephone company in Texas and New Mexico and should be included in any federal support mechanisms for rural carriers. Please contact Leonard Beurer, Director-Rates and Tariffs, at the address and number below for further assistance.

Sincerely,

Jerry M. Allen
Vice President-Accounting and Finance

Valor Telecommunications Southwest, LLC
600 E. Las Colinas Blvd., Suite 1900, Dallas, TX 75039
Telephone : (972) 373-1000 Facsimile : (972) 373-1050

NORTH AMERICAN CELLULAR NETWORK

Coast-to-coast cellular coverage

Cellular One service is available in over 7,000 cities throughout our North American Cellular Network. So you can make and receive calls automatically in many cities across the nation.

NEW MEXICO

Alamogordo

1000 E. 10th
(505) 439-0290

Carlsbad

1007 N. 4th
(505) 195-1072

Hobbs

1800 N. Turner
(505) 393-0136

Roswell

2611 N. Main
(505) 621-8073

OKLAHOMA

Altus

3000 N. Main Street
Suite 100
(509) 477-1217

Anadarko

210 S.W. 8th
(405) 247-2472

Chickasha

1744 S. 4th Street
(405) 222-3232

Duncan

3015 N. Highway 81
(509) 252-1771

Elk City

1100 Access Road
(509) 243-0231

Frederick

1111 S. Main
(505) 335-3652

TEXAS

Abilene

4008 S. 14th Street
(915) 1601-0000

Big Spring

501 Broadway Lane #22
(915) 264-2013

UTAH

Albany

1000 E. 10th

Shopping Center
(801) 273-2013

Breckinridge

1822 W. Walker Street
(253) 550-1005

Childress

2001 Avenue G NW
(940) 937-8510

Dalhousie

515 E. 10th
(940) 219-8411

Dumas

212 W. 1st Street
Space C-2
(940) 935-6500

Floydada

111 W. 4th Street
(806) 393-8040

Graham

1221 Highway 10 S
(940) 507-1005

Husk

10 Avenue D North
(940) 804-8505

Merford

5151 N. 25th Highway
Merford
(806) 364-1005

Lamesa

701 N. 1st
(806) 872-7282

Leveland

1005 College Avenue
(806) 894-8004

Lubbock

3103 1st Street
(806) 797-2355

Veron

5217 82nd Street
(806) 708-1181

MISSISSIPPI

Albany

5321 Main Street
(915) 520-3535

Odessa

1011 E. 12th
(915) 551-2000

Olney

111 E. Main Street
(214) 561-3000

Pampa

1329 N. Hickory
(806) 609-1435

Pecos

1213 S. 10th
(915) 487-9125

Plainview

2215 W. 10th Street
(940) 293-7000

Post

221 E. Main Street
(806) 495-3500

San Angelo

1917 Knickerbocker Road
(915) 946-9900

Snyder

104 E. 10th
(940) 801-5512

Snyder

1000 College Avenue
(940) 573-7907

Sonora

201 A Highway 277 N
(915) 387-2861

Sweetwater

1400 Hinky Street
Suite C
(915) 235-0300

Veron

1117 10th Street
(940) 553-1005

COVERAGE



New Mexico, Oklahoma & Texas

Customer Care
1-800-635-0304
or dial 611 free
from your cellular phone



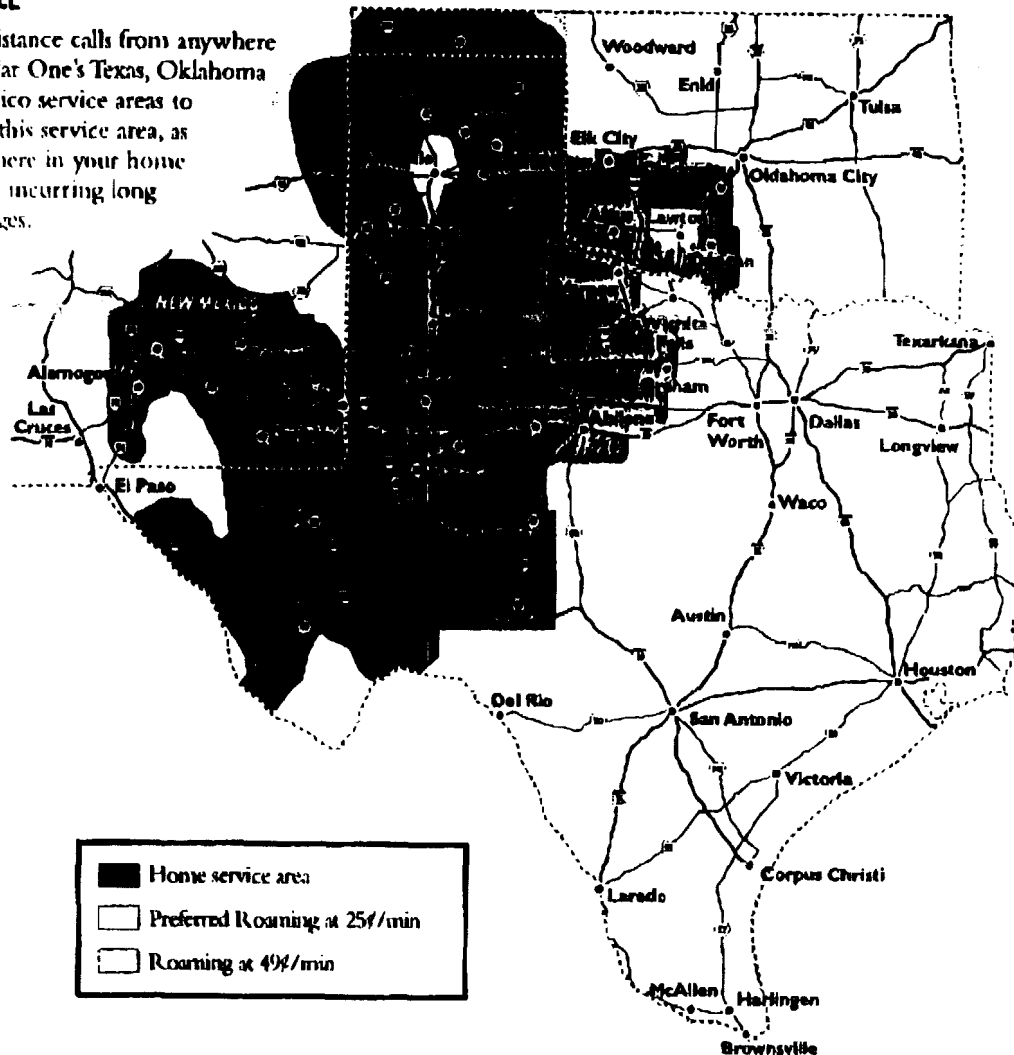
www.cellularonewest.com

CELLULARONE

Cellular One is a registered service mark of The Cellular One Group.
©2000 Western Wireless Corporation
WW-C175 1/00

CELLULARONE

Make long distance calls from anywhere within Cellular One's Texas, Oklahoma or New Mexico service areas to anywhere in this service area, as well as anywhere in your home state, without incurring long distance charges.

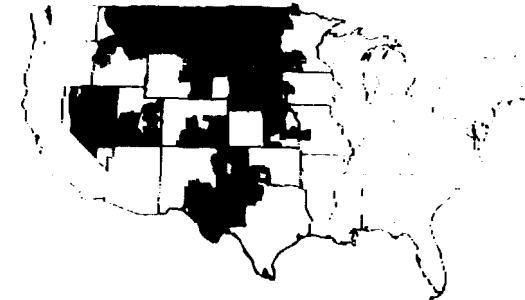


CELLULAR ONE'S DIGITAL NEIGHBORHOOD

Be able to place calls from anywhere in the U.S. with Cellular One. Cellular One lets you make calls from anywhere without paying roaming fees. Also, your one distance flat rate will apply to calls made from anywhere within the Digital Neighborhood, or anywhere in the continental U.S. The cost of Cellular One is just \$2.99 a month.

■ ROAMER EXPRESS DIAL #2

Determining your home calling area's now easier with our free-of-charge Roamer Express number. It lets you instantly confirm whether you're within the Cellular One 16-state service area.

**Digital Neighborhood™**

49) Roaming

794 Roaming

Even though your ROAMING indicator may be on, you are not charged roaming fees.





VALOR Telecom wants to be more than your friendly, neighborhood telephone company. VALOR Telecom plans to be your connection company, providing the products and services necessary to keep you in touch with the important people, places and experiences in your life.

What's more, VALOR Telecom will be here to ensure your connection keeps pace with today's state-of-the-art technology, be it business communication services, Internet connections or simply the phone in your home.

GTE local service customers in Oklahoma became VALOR Telecom customers on July 1, 2000. In September, 2000, GTE local service customers in New Mexico, most of east Texas, west Texas along and north of Interstate 20, and the Texas Panhandle will become VALOR Telecom Customers. We invite you to take a few moments to search our site and learn a little about who we are and some of the products and services we plan to offer.



Bringing the World to Your Neighborhood.

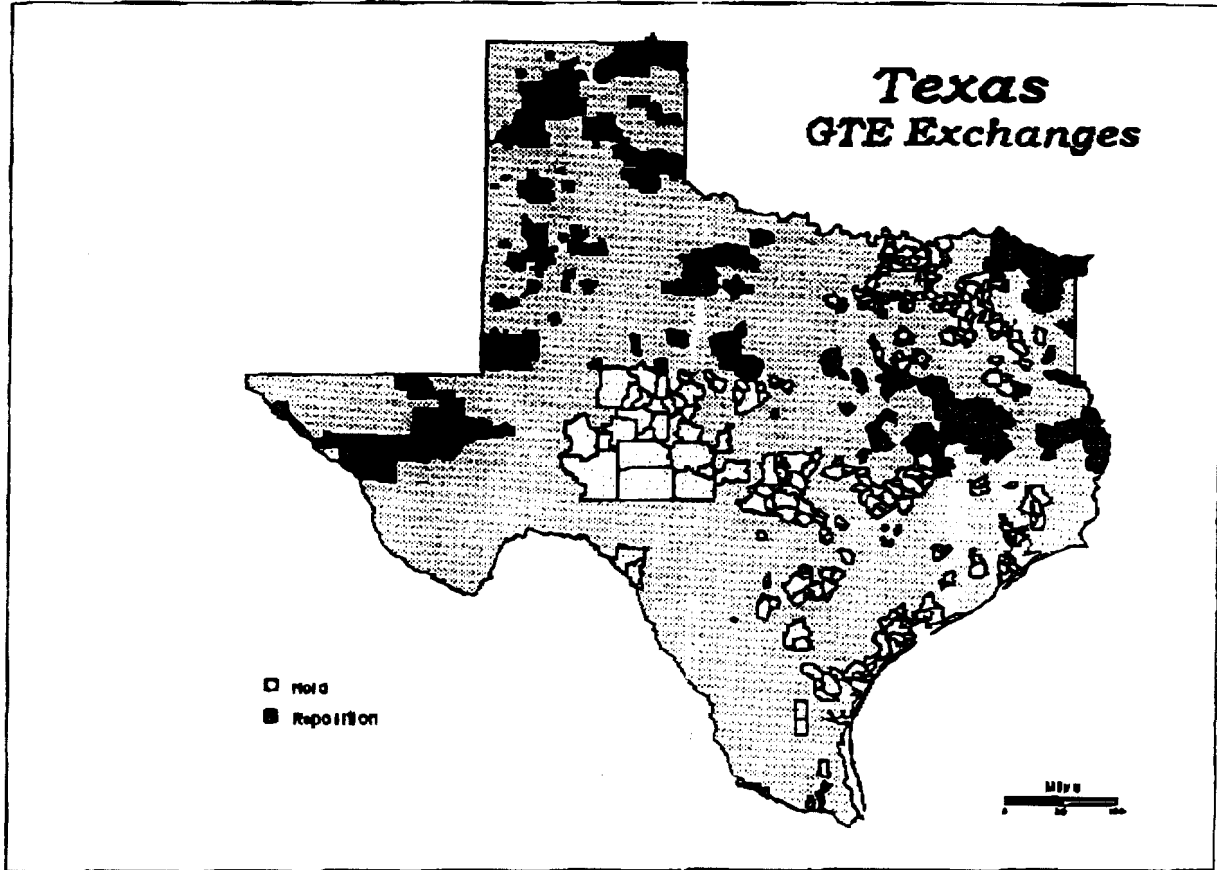
(877)520-5220





Home	Search	Site Map	Contact Us
Products & Services	Customer Support	About Verizon	

About Verizon
 L NewsCenter
Repositioning Maps



[Back to Press Release](#)
[Back to About](#)
[Back to Maps index](#)

Home	Search	Site Map	Contact Us	Verizon.com
Products & Services	Customer Support	About Verizon		

[Verizon Privacy Policy](#)
[Legal Disclaimer](#), Copyright 1995-2000
 Verizon Communications. All Rights Reserved.



**VALOR Telecom Home**

products and services

VALOR Telecom provides local phone service to all areas formerly served by GTE in Oklahoma, and will soon be providing local phone service to GTE customers in New Mexico, as well as most areas of east Texas, west Texas along and north of Interstate Highway 20, and the Texas Panhandle. As local areas change ownership from GTE to VALOR Telecom, customers will find most of the same products and services they currently have with GTE. Beginning shortly after the change, VALOR Telecom will begin to roll out new services in many of the areas we will serve.

At VALOR Telecom, we know your phone line is Bringing the World to Your Neighborhood. You use it to stay in touch with friends and family, keep your business communicating smoothly with your customers, and increasingly important in today's wired world, to remain current with the world via the Internet.

Residential and Business Service

Your phone service enables you to:

- Make local calls within your service area.
- Make local toll calls outside your local toll-free calling area.
- Access your long-distance carrier to make toll calls within the United States or internationally.
- Use a modem to send faxes, communicate via e-mail or enjoy other internet services anywhere in the world.

All of these services remain the same as your phone services switch from GTE to VALOR Telecom.

VALOR Calling Features and Other Services

Calling Features can help maximize your phone service, making it easier for you to stay in touch. These services may not be available in all areas. Just call customer service to determine which services are available in your area.

Click the feature to see detailed instructions on how to use the feature.

Additional Lines. Order extra lines for your home or business. Residential customers can benefit from an extra line for

teenagers, access to the internet, telecommuting and working from home. Business customers will see the benefits through enhanced customer service and increased sales productivity.

Caller ID. See the name and number of the person calling before you answer the phone. If you combine Caller ID with Call Waiting, you can even know who is calling while you are on the phone.

Voice Mail. Receive messages from callers when you're on the phone or when you are unavailable.

Busy Redial *66. Redial "busy" numbers automatically. If the number you're calling is busy, activate Busy Redial, and for up to 30 minutes it will keep trying the number and alert you with a distinctive ring when that number becomes available. Busy Redial only works on calls within your defined calling area. Available on a monthly basis or, in some areas, available on a pay-per-use basis.

Call Block. Stop annoying and unwanted calls. Call Block allows you to select up to 12 numbers from your local calling area that will be blocked from reaching you. Blocked callers receive a polite message saying you are not currently accepting calls.

Call Forwarding. Arrange for your calls to follow you wherever you go. Forward all your calls to a number you specify. Or choose Custom Call Forwarding, to forward only the calls you want to receive (up to 12 numbers).

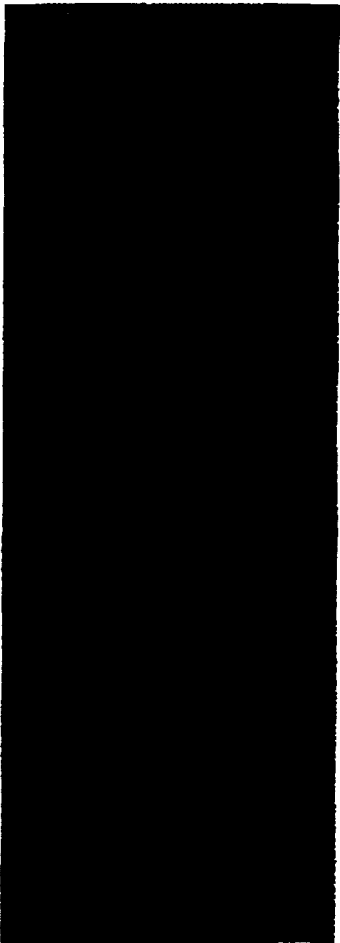
Call Return *69. Dial missed calls automatically. If you didn't get to the phone in time or simply want to know if someone called while you were talking on the phone, use *69. The service automatically stores the number of the last person who called. Available on a monthly basis or, in some areas, available on a pay-per-use basis.

Call Waiting. Hear a signal you have another call while you're on the phone. With Call Waiting you can alternate between callers, answering incoming calls while on the phone with someone else. The Cancel Call Waiting feature allows you to turn off the call waiting function so you're not interrupted during important calls or when sending a FAX or data file.

Distinctive Ring. Advantages of a second line without the cost. With Distinctive Ring you have two different numbers on the same phone line. You can use one number for yourself and the other for a family member, business line or FAX machine. A unique ring lets you know which number is being called.

Custom Call Acceptance. Restrict incoming calls to those from only a select group of people. With Custom Call Acceptance, you can select up to 12 numbers that will be able to reach you. Callers from other numbers receive a polite message saying that you are not currently receiving calls.

Speed Calling. Dial frequently called numbers in a jiffy. You



can select either Speed Calling 8 or Speed Calling 30 (This service stores either 8 or 30 numbers). Once you've programmed in the numbers, Speed Dial will work from any phone in your home or office.

Three Way Calling. Talk to two parties at the same time. Perfect for impromptu conference calls.

Personal Alert. Know when a very important person is calling before you pick up the phone. You can select up to 12 numbers that will have a unique ring when they call you.

Call Tracing Service. Store calling information to help you trace harassing, threatening or obscene phone calls. The call record is stored in VALOR Telecom's system for ten days. Contact us with the exact date and time of the call within 10 days from the date of the call.

Bringing the World to Your Neighborhood.™

[company information](#) | [billing and payment](#) | [contact us](#) |
[products and services](#) | [employment opportunities](#) | [FAQ](#)

VALOR
TELECOM

VALOR Telecom Home

billing and payment

VALOR Telecom provides local phone service to all areas formerly by GTE in Oklahoma, and will soon be providing local phone service to GTE customers in New Mexico, as well as most areas of east Texas, and west Texas along and north of Interstate Highway 20, and the Texas Panhandle. As local areas change ownership from GTE to VALOR Telecom, basic rates will remain the same. We have worked with the major long-distance carriers to develop systems that will display long-distance charges on the VALOR Telecom monthly statement.

Your Monthly Statement

The primary change you will see in your local service is a new monthly statement from VALOR Telecom. You will find the monthly statement easy-to-read and simple-to-understand.

Click [here](#) to see an explanation of your monthly statement.

Your Payment

Customers should make their checks or money orders payable to VALOR Telecom. Payment should be sent to:

VALOR Telecom
P.O. Box 660766
Dallas, TX 75266-0766

or customers can choose to pay in-person at VALOR Telecom authorized payment centers. For fast, accurate payment, ask about our bank draft plan, or use your credit card.

Any questions can be directed to VALOR Telecom at 811 or from outside of VALOR Telecom's service area call (877) 520-5220.

Bringing the World to Your Neighborhood.™

[company information](#) | [billing and payment](#) | [contact us](#) |
[products and services](#) | [employment opportunities](#) | [FAQ](#)



**VALOR
TELECOM**

VALOR Telecom Home

employment opportunities

Come Join Our Team!

VALOR Telecom provides local phone service to all areas formerly served by GTE in Oklahoma, and will soon be providing local phone service to GTE customers in New Mexico, as well as most areas of east Texas, west Texas along and north of Interstate Highway 20, and the Texas Panhandle. VALOR Telecom is currently looking for experienced telecommunications industry professionals to join the VALOR team. VALOR Telecom is especially interested in experienced individuals as:

Telecommunication Engineers

Technicians

Field Supervisors

Billing Managers

Accountants

Inquiries as to current and future job openings can be directed to:

VALOR Telecom
Human Resources Department
600 E. Las Colinas Blvd., Suite 1900, Irving, TX 75039
Fax - (972) 373-1025
Email - sdykes@valortelecom.com

Bringing the World to Your Neighborhood.™

[company information](#) | [billing and payment](#) | [contact us](#) |
[products and services](#) | [employment opportunities](#) | [FAQ](#)



VALOR Telecom Home

contact us

Contact VALOR Telecom:

P.O. Box 1366
Española, NM 87532

(877) 520-5220

info@valortelecom.com

Bringing the World to Your Neighborhood.™

[company information](#) | [billing and payment](#) | [contact us](#) |
[products and services](#) | [employment opportunities](#) | [FAQ](#)

**VALOR
TELECOM****VALOR Telecom Home**

FAQ

What is VALOR Telecom?

VALOR Telecommunications, LLC was formed in September 1999, and since that time has acquired over 520,000 local access lines being sold by GTE in New Mexico, Oklahoma and Texas.

Where is VALOR Telecom based?

VALOR Telecom is headquartered at Las Colinas in Irving, Texas.

Who leads VALOR Telecom?

Anne K. Bingaman, a telecommunications industry veteran with over 30 years experience serves as Chairman and CEO of VALOR Telecom. Previously, Ms. Bingaman served as President of Local Services Division of LCI International, then the nation's sixth-largest long-distance company, before it was purchased by Qwest Communications in June 1998. Prior to that, Ms. Bingaman served as U.S. Assistant Attorney General for Antitrust from 1993-1996.

Kenneth R. Cole, a 26 year veteran of the telephone industry, is President and Chief Operating Officer. Mr. Cole has held a variety of leadership positions at CenturyTel, Inc., the nation's seventh largest local phone service provider and ninth largest cellular provider. Prior to joining VALOR Telecom, Mr. Cole served as CenturyTel's Chief Operating Officer and Executive Vice President, responsible for all of CenturyTel's lines of business, including the management of 1.2 million local access lines in 21 states.

When will VALOR Telecom begin offering local phone service?

VALOR Telecom began providing local phone service in Oklahoma on July 1, 2000. VALOR Telecom plans to provide local phone service in New Mexico and Texas on September 1, 2000, pending regulatory approvals.

Will my rates change?

Rates will not change.

Will VALOR have new employees in my town?

The GTE employees in the sale areas will transfer to VALOR. The service people providing your service today will be the service people you work with when VALOR begins operating in your area.

What steps have been taken to prepare for the switch from GTE to VALOR ?

VALOR Telecom has established sales, service and billing inquiry call centers in Carlsbad, New Mexico and Texarkana, Texas. Once the switchover is complete, customers will be able to call these centers when they need to install new phone lines, inquire about their phone bill or simply ask general questions about their service. The VALOR call center in Texarkana will also perform remote repair functions as well as schedule technicians for field repair work. A finance operations/billing center in Espanola, New Mexico will oversee activities required for accounts with past due balances and toll billing.

How will I know when VALOR Telecom is my local phone service provider?

VALOR Telecom will send notices to all its new customers prior to the switchover, informing them of the date when the switch will occur and the new telephone numbers to reach VALOR Telecom's service centers.

Will I see any changes in my local phone service when VALOR Telecom begins providing local phone service?

VALOR Telecom is working closely with GTE to ensure that the cut over will be undetectable to customers. You will continue to have the same local products and services that GTE offers you today. The primary change you will see will be a new invoice and new customer service numbers for contacting VALOR Telecom.

Will my phone number(s) change?

No. Your phone number(s) will remain the same as they were when GTE was your local carrier.

Will VALOR Telecom bring new services to my community?

VALOR Telecom's long-term commitment is to offer all its customers a full-range of telecommunications services, such as new calling plans, enhanced calling features, DSL and Internet access. We will work hard to bring new services to your community.

Will my long distance carrier stay the same?

Your long distance carrier will remain the same unless you request a change. VALOR Telecom plans to offer long distance service later this year, and we will let you know when it is available in your area.

Will my GTE Calling Card still work?

Yes, you can continue to use your GTE Calling Card until you receive your new VALOR Telecom Calling Card later this year.

We hope we have answered many of your questions about VALOR Telecom. We look forward to serving you.

Bringing the World to Your Neighborhood.™

[company information](#) | [billing and payment](#) | [contact us](#) |
[products and services](#) | [employment opportunities](#) | [FAQ](#)